

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHN DOE,	)	
	)	No. 08 C 1050
Plaintiff,	)	
	)	JUDGE JOAN B. GOTTSCHALL
v.	)	
	)	MAGISTRATE JUDGE
JASON FORTUNY,	)	ARLANDER KEYS
	)	
Defendant.	)	DEMAND FOR JURY TRIAL

**PLAINTIFF’S MOTION FOR AN EXTENSION OF TIME TO FILE RESPONSE TO  
DEFENDANT’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

NOW COMES the Plaintiff, John Doe (“Plaintiff”), by and through his attorneys, Mudd Law Offices, and files his Motion for an Extension of Time to File Response to Defendant’s Motion to Dismiss Plaintiff’s Complaint and states as follows:

1. On February 20, 2008, Plaintiff filed his Complaint in the above-captioned action.
2. The Plaintiff made substantial efforts to serve Defendant Jason Fortuny (“Defendant”) through regular means.
3. On May 21, 2008, the Court granted Plaintiff’s “motion for leave to obtain service of process on the defendant through alternative means because of difficulties in obtaining service through regular means.” May 21, 2008 Order (Doc. #17).
4. On June 23, 2008, Plaintiff’s counsel filed a declaration attesting that service had been effectuated according to the Court’s May 21, 2008 Order.
5. On July 11, 2008, after finally being effectively served, the Court received correspondence from the Defendant.
6. On July 14, 2008, the Court ordered the Clerk to treat Defendant’s correspondence as a Motion to Dismiss (“Defendant’s Motion”). The Court also ordered

Plaintiff to respond to Defendant's Motion on or before August 11, 2008 and the Defendant to file his reply on or before September 1, 2008.

7. Since July 11, 2008, the associate assigned to this matter at Mudd Law Offices resigned. A new associate did not begin employment at Mudd Law Offices until August 4, 2008.

8. For the foregoing reasons, the Plaintiff's counsel respectfully requests an extension of time of fourteen days from August 11, 2008, or until August 25, 2008, in which to respond to Defendants' Motion. Additionally, Plaintiff's counsel requests that the deadline for Defendant's reply be extended until September 15, 2008.

9. Therefore, the Plaintiff respectfully moves this Court to (a) strike the existing briefing schedule on Defendant's Motion; (b) provide Plaintiff until August 25, 2008 in which to file a response to Defendants' Motion; and (c) provide Defendant until September 15, 2008 in which to file a reply in support of Defendants' Motion.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order granting the above requested relief.

Dated: Chicago, Illinois  
August 6, 2008

PLAINTIFF  
JOHN DOE

A handwritten signature in black ink, appearing to be 'CM', written over a horizontal line.

By: One of His Attorneys  
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